

# Exhibit D

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

DAVITA M. KEY,

Plaintiff,

v.

HYUNDAI MOTOR MANUFACTURING  
ALABAMA, LLC, HYUNDAI  
ENGINEERING AMERICA, INC. and  
DYNAMIC SECURITY, INC.

Defendants.

CIVIL ACTION NUMBER:  
2:19-cv-00767-ECM-SMD

**DECLARATION OF ROBERT BURNS PURSUANT TO 28 U.S.C. § 1746**

My name is Robert Burns. I am a resident of the State of Alabama, over twenty-one (21) years of age, and give this Declaration of my own free will. I have personal knowledge of the information contained in this Declaration.

1. From December 2016-October 2018, I was the Director of Team Relations, Public Relations, General Affairs, and Human Resources for Hyundai Motor Manufacturing Alabama, LLC ("HMMA"). In October 2019, I was promoted to Vice President of Human Resources and Administration for HMMA.

2. In this role, I have access to HMMA's employment records.

3. I also have access to certain contractual arrangements between HMMA and third parties, including but not limited to as would be required to defend EEOC Charges or other accusations involving non-employees.

4. HMMA has never employed Davita Key.

5. HMMA has also never employed Cassandra Williams, Gloria Robinson, Maurice Chambliss, or Tonya Howell.

6. In July and August 2017, HMMA had a contractual relationship with Hyundai ENG America, Inc. ("HEA") where HEA agreed to provide certain security and other services.

7. HEA is a wholly separate company, and upon information and belief is based in Irvine, California. HEA is not a subsidiary or parent of HMMA. Nor is HMMA a subsidiary or parent of HEA. HMMA does not share policies, executives, or resources with HEA.

8. HMMA employs no personnel jointly with HEA.

9. In investigating Ms. Key's EEOC Charge which is the basis of this suit, HMMA determined that Ms. Williams was employed by HEA; and Ms. Key, Ms. Robinson, Mr. Chambliss, and Ms. Howard were all employed by Dynamic Security, Inc.

10. Dynamic Security, Inc., provides certain services to HEA.

11. HMMA has never had a contractual relationship with Dynamic Security, Inc.

12. HMMA employs no personnel jointly with Dynamic Security, Inc.

13. Dynamic Security, Inc. is not a subsidiary or parent of HMMA. Nor is HMMA a subsidiary or parent of Dynamic Security, Inc. HMMA does not share policies, executives, or resources with Dynamic Security, Inc.

*I declare under penalty of perjury that the foregoing is true and correct.*

Executed on Jan. 29, 2020

  
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Robert Burns